

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:19-cv-00427-BO**

**NOKIA TECHNOLOGIES OY,
Plaintiff,**

v.

**LENOVO (SHANGHAI) ELECTRONICS
TECHNOLOGY CO. LTD., LENOVO GROUP,
LTD., LENOVO BEIJING, LTD., LENOVO PC
HK LIMITED, AND LENOVO (UNITED
STATES), INC.,**

Defendants.

**CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND
TO MOTION TO LIFT STAY**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, and with the consent of Plaintiff's counsel, Defendant Lenovo (United States) Inc. ("Lenovo US") moves the Court for an extension up to and including **April 14, 2021**, in which to respond to Plaintiff Nokia Technologies Oy's Motion to Lift Stay for the Limited Purpose of Requesting an Injunction Against a Second Filed Case Raising the Same Issues Present Here (ECF No. 119) ("Nokia's Motion to Lift Stay"). In support of this Motion, Lenovo US shows the Court the following:

1. On September 25, 2019, Plaintiff filed this Lawsuit;
2. On September 18, 2020, this Court entered an Order staying all proceedings (ECF No. 118);
3. On February 17, 2021, Nokia moved to the lift the stay (ECF No. 119);
4. Under Local Civil Rule 7.3(f)(1), Lenovo US's response to Nokia's Motion to Lift Stay was originally due March 10, 2021;
5. On March 9, 2021 and March 23, 2021, Lenovo US filed Consent Motions for Extension of Time to Respond to Motion to Lift Stay (ECF Nos. 122, 123);

6. The Court granted the motions to extend time on March 10, 2021 and March 23, 2021, respectively (text orders);
7. Lenovo US needs additional time to evaluate Nokia's Motion to Lift Stay and to continue conversations with Nokia in an attempt to forego the need for Nokia's Motion altogether;
8. Counsel for Lenovo US has contacted counsel for Plaintiff, who has consented to this Motion; and
9. This Motion is made in good faith and not for the purpose of delay.

WHEREFORE, Lenovo US requests that this Court grant its motion and allow Lenovo US until **April 14, 2021** to respond to Nokia's Motion to Lift Stay.

Respectfully submitted, this the 5th day of April, 2021.

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/s/ Jacob S. Wharton

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